

THE ROSEN LAW FIRM, P.A.

Phillip Kim, Esq. (PK 9384)
Laurence M. Rosen, Esq. (LR 5733)
275 Madison Avenue, 40th Floor
New York, New York 10016
Telephone: (212) 686-1060
Fax: (212) 202-3827
Email: pkim@rosenlegal.com
Email: lrosen@rosenlegal.com

Counsel for Michael Churton

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JUNE E. ADAMS IRREVOCABLE TRUST
DATED 7/21/14 FBO EDWARD ROBERT
ADAMS, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

INTERNATIONAL BUSINESS MACHINES
CORPORATION, VIRGINIA M. ROMETTY,
MARTIN J. SCHROETER, JAMES J.
KAVANAUGH and ARVIND KRISHNA,

Defendants.

CASE No.: 7:22-cv-02831-VB

**NOTICE OF WITHDRAWAL OF
MOTION OF MICHAEL
CHURTON TO: (1) APPOINT LEAD
PLAINTIFF; AND (2) APPROVE
LEAD PLAINTIFF'S SELECTION
OF COUNSEL**

CLASS ACTION

Movant Michael Churton (“Movant”) hereby withdraws his motion to appoint Lead Plaintiff, and approve of Lead Plaintiff’s selection of counsel (Dkt. No. 14). Having reviewed the competing motions filed in the action, Movant does not appear to have the largest financial interest.

This withdrawal shall have no impact on Movant’s membership in the proposed class, Movant’s right to share in any recovery obtained for the benefit of class members, and Movant’s ability to serve as a representative party should the need arise.

Dated: June 13, 2022

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

/s/ Phillip Kim

Phillip Kim, Esq. (PK 9384)

Laurence M. Rosen, Esq. (LR 5733)

275 Madison Avenue, 40th Floor

New York, New York 10016

Telephone: (212) 686-1060

Fax: (212) 202-3827

Email: pkim@rosenlegal.com

Email: lrosen@rosenlegal.com

Counsel for Michael Churton

CERTIFICATE OF SERVICE

I hereby certify that on June 13, 2022, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/Phillip Kim